

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
|--|---|--------------------|
| GARRY R. BARNES AND GLB VENTURE, LLC, |) | |
| |) | Case No. 08-162 |
| |) | |
| Plaintiffs, |) | Hon. Ronald Guzman |
| |) | |
| v. |) | |
| |) | |
| NEUROMARK, INC., |) | |
| |) | |
| Defendant. |) | |

**PLAINTIFFS' AGREED MOTION FOR LEAVE
TO FILE AN AMENDED COMPLAINT**

Plaintiffs, Garry R. Barnes and GLB Venture, LLC, ask this Court for leave to file an amended complaint, and in support hereof, respectfully state as follows:

1. On January 11, 2008, Plaintiffs filed the complaint initiating this case.
2. In July of 2008, Plaintiffs' first counsel withdrew and current counsel filed their appearances.
3. Upon review of the complaint, current counsel determined that a few of its statements were erroneous. Hence plaintiffs wish to file an Amended Complaint correcting the mistakes. Attached hereto as **Exhibit A** is a copy of the Amended Complaint that Plaintiffs ask leave to file. For the sake of economy, Plaintiffs have not attached the exhibits to the Amended Complaint, which, in

any event, are identical to the exhibits to the original complaint. If this motion is granted, Plaintiffs will file the Amended Complaint complete with all exhibits.

4. Defendant has no objection to the relief requested.

5. The relief requested should not delay the progress of this case, as the changes contained in the proposed amended complaint are modest in scope.

WHEREFORE, Plaintiffs request that this Court enter an order:

A. Granting them leave to file an amended complaint; and,

B. Granting them such other and further relief as is just and equitable.

Date: August 21, 2008

Respectfully submitted,

By: /s/ Jessica Tovrov
One of the Plaintiffs' Attorneys

Adam Goodman
Jessica Tovrov
Goodman Law Offices LLC
17 North State Street
Suite 1700
Chicago IL 60602
(312) 238-9592
(312) 264-2535 (fax)
adam@thegoodmanlawoffices.com

